MEMORANDUM



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TO: Management Committee

FROM: Jill Bicknell and Julie Stephenson

APPROVED BY: Site Design Standards and Source Controls Work Group, September 5, 2002

DATE: September 15, 2002

SUBJECT: DRAFT MODEL LIST OF SOURCE CONTROL MEASURES

INTRODUCTION

Provision C.3.k. of the Santa Clara Valley Urban Runoff Pollution Prevention Program's (SCVURPPP) National Pollutant Discharge Elimination System (NPDES) permit states in part: "The Dischargers shall, as part of their continuous improvement process, submit enhanced New and Redevelopment Performance Standards which summarize source control requirements for new and redevelopment projects to limit pollutant generation, discharge, and runoff, to the maximum extent practicable... A model enhanced Performance Standard and proposed work plans for its implementation shall by submitted by March 1, 2003. Implementation shall begin no later than July 1, 2003, and the status shall thereafter be reported in the Dischargers' Annual Reports...." Provision C.3.k. also provides examples of source control measures to be addressed. Table 2 of the Provision, "Implementation Schedule", requests submittal of "draft conditions of approval for source control measures" by September 15, 2002.

PROCESS FOR MODEL LIST DEVELOPMENT

To address the C.3.k. requirements, the Program convened a work group with representatives of the Cities of Palo Alto, Milpitas, San Jose, and Sunnyvale. Program staff also compiled a draft list of source control measures currently used by Co-permittees and other stormwater programs and agencies (see Reference section). The work group met on July 23, 2002 to discuss the draft list.

As a result of discussions at the July 23 meeting, it became apparent that Co-permittees impose requirements on development projects, including source control requirements, using a number of different mechanisms depending on the type of project and the Co-permittee's review process. These mechanisms may include the following:

- Municipal codes and ordinances;
- Application review checklists
- Application review results letters (e.g., "30-day letters");
- Plan check comments (e.g., "decision letters");
- Conditions of approval in project approval documents;
- Mitigation measures in EIRs;
- Conditions on plan sheets that are part of construction drawings.

Based on these discussions, it was decided that the product of the work group would be a model list of source control measures that may be imposed as either up-front submittal requirements or checklists, conditions of approval, or plan check comments, etc. depending on the particular planning process used by each Co-permittee. These measures will be primarily expressed as requirements rather than best management practices, to meet the intent of Provision C.3.k. Furthermore, it made sense to relate the source control measures to significant sources of potential pollutants that may be present on the developed site, rather than to a general type of development project.

As a result, another draft of the model list of source control measures was developed and refined during the August 6 work group meeting. The revised draft model list (attached) includes measures to control sources of pollutants associated with the post-construction phase of new development and redevelopment projects. Each identified source of pollutants may have one or more appropriate control measures. The model list is intended to be a menu of measures from which Co-permittees may select appropriate measures to apply to specific projects. (Co-permittees do not have to use the exact wording of a source control measure as long as the intent of the measure is preserved.) Once approved, these source control measures will be included as an attachment to the enhanced Planning Procedures Performance Standards, as discussed above. The model list does not include construction BMPs, site design measures, or stormwater treatment measures. These are or will be covered under other performance standards or other guidance for implementation of C.3.

REFERENCES

The model list of source control measures developed using the following information sources:

- BASMAA "Start at the Source Tools Handbook" (June 2000);
- Alameda Countywide Clean Water Program (ACCWP) Model Conditions of Approval (1999);
- City of Palo Alto Municipal Code Chapter 16.09, and revisions to Chapter 16.09 approved July 22, 2002;
- City of San Jose standard conditions (need reference);
- City of Cupertino, Guidance for Selecting BMPs for Development Projects;
- Example source control measures provided by Regional Board staff in Provision C.3.k. of the SCVURPPP NPDES Permit (October 2001).

MODEL LIST OF SOURCE CONTROL MEASURES

INTRODUCTION

The following list contains measures to control sources of storm water pollutants associated with the post-construction phase of new development and redevelopment projects. Each identified source of pollutants may have one or more appropriate control measures. The model list is intended to be a menu of measures from which Co-permittees may select appropriate measures to apply to specific projects. Co-permittees do not have to use the exact wording of a source control measure as long as the intent of the measure (i.e., to keep pollutants out of storm water, groundwater, creeks and the Bay) is preserved. Phrases in brackets represent alternative or optional wording.

STRUCTURAL CONTROL MEASURES

A. Illegal Dumping to Storm Drain Inlets and Waterways

- 1) On-site storm drain inlets shall be clearly marked with the words "No Dumping! Flows to Bay," or equivalent, using methods approved by the [Co-permittee].
- 2) It is unlawful to discharge any wastewater into storm drains, gutters, creeks, or the San Francisco Bay. Unlawful discharges to storm drains include, but are not limited to, discharges from toilets; sinks; industrial processes; cooling systems; boilers; fabric cleaning; equipment cleaning; or vehicle cleaning.
- It is unlawful to cause hazardous domestic waste materials to be deposited in such a manner or location as to constitute a threatened discharge into storm drains, gutters, creeks or San Francisco Bay.

B. Interior Floor Drains

1) Interior floor drains shall be plumbed to the sanitary sewer system and shall not be connected to storm drains.

C. Parking Lots

 Interior level parking garage floor drains shall be connected to [a water treatment device approved by the (Co-permittee) prior to discharging to] the sanitary sewer system. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.

D. Pesticide/Fertilizer Application

- 1) Landscaping shall be designed to minimize irrigation and runoff, promote surface infiltration where appropriate, and minimize the use of fertilizers and pesticides that can contribute to stormwater pollution.
- 2) Structures shall be designed to discourage the occurrence and entry of pests into buildings, thus minimizing the need for pesticides. For example, dumpster areas should be located away from occupied buildings, and building foundation vents shall be covered with screens.
- 3) Additional requirements are covered in the "Model Conditions of Approval for Pest Resistant Landscaping" (August 19, 2002).

E. Pool, Spa, and Fountain Discharges

- 1) Pool (including swimming pools, hot tubs, spas and fountains) discharge drains shall not be connected directly to the storm drain or sanitary sewer system. [Exception: Public pool discharge drains must be connected to the sanitary sewer system, per County Department of Environmental Health requirements.]
- 2) When draining is necessary, a hose or other temporary system shall be directed into a sanitary sewer clean out. The clean out shall be installed in a readily accessible area [example: within 10 feet of the pool]. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.

F. Food Service Equipment Cleaning

1) Food service facilities (including restaurants and grocery stores) shall have a sink or other area for cleaning floor mats, containers, and equipment, that is connected to a grease interceptor prior to discharging to the sanitary sewer system. The cleaning area shall be large enough to clean the largest mat or piece of equipment to be cleaned. The cleaning area shall be indoors or in a covered area outdoors; both areas must be plumbed to the sanitary sewer.

G. Refuse Areas

- 1) New buildings [such as food service facilities and/or multi-family residential complexes or subdivisions] shall provide a covered or enclosed area for dumpsters and recycling containers. The area shall be designed to prevent water run-on to the area and runoff from the area.
- 2) Areas around trash enclosures, recycling areas, and/or food compactor enclosures shall not discharge to the storm drain system. Any drains installed in or beneath dumpsters, compactors, and tallow bin areas serving food service facilities shall be connected [to a grease removal device prior to discharging] to the sanitary sewer. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.

H. Outdoor Process Activities/Equipment¹

- 1) Process activities shall be performed either indoors or outdoors under cover. If performed outdoors, the area shall be designed to prevent run-on to and runoff from the site.
- Process equipment areas shall drain to the sanitary sewer system. The applicant shall contact
 the local permitting authority and/or sanitary district with jurisdiction for specific connection and
 discharge requirements.

I. Outdoor Equipment/Materials Storage

1) All outdoor equipment and materials storage areas shall be covered [and bermed], or shall be designed to limit the potential for runoff to contact pollutants [or a storm drain inlet valves shall be provided on exterior drains in the area].

¹ Examples of businesses that may have outdoor process activities and equipment include machine shops and auto repair shops, and industries that have pretreatment facilities.

- 2) Storage areas containing non-hazardous liquids shall be covered by a roof and/or drain to the sanitary sewer system, and be contained by berms, dikes, liners or vaults. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.
- 3) All hazardous materials and wastes, as defined [or regulated] by [cite ordinance or regulation], on the site must be used and stored in compliance with the [Co-permittee's] Hazardous Materials Ordinance and Hazardous Materials Management Plan for the site approved by the [Co-permittee department].

J. Vehicle/Equipment Cleaning

- 1) Wastewater from vehicle and equipment washing operations shall not be discharged to the storm drain system. [Optional, e.g. for car dealerships: If water only (without soap or other cleaning agent) is used for rinsing of vehicle exterior surfaces for appearance purposes, the runoff may be discharged to the storm drain system.]
- 2) Commercial/industrial facilities having vehicle/equipment cleaning needs [and new residential complexes of 25 units or greater] shall either provide a covered, bermed area for washing activities or discourage vehicle/equipment washing by removing hose bibs and installing signs prohibiting such uses. Vehicle/equipment washing areas shall be paved, designed to prevent run-on to or runoff from the area, and plumbed to drain to the sanitary sewer. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.
- 3) Commercial car wash facilities shall be designed and operated such that no runoff from the facility is discharged to the storm drain system. Wastewater from the facility shall discharge to the sanitary sewer [or a wastewater reclamation system shall be installed]. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.

K. Vehicle/Equipment Repair and Maintenance

- Vehicle/equipment repair and maintenance shall be performed in a designated area indoors, or if such services must be performed outdoors, in an area designed to prevent the run-on and runoff of stormwater.
- 2) Secondary containment shall be provided for exterior work areas where motor oil, brake fluid, gasoline, diesel fuel, radiator fluid, acid-containing batteries or other hazardous materials or hazardous wastes are used or stored. Drains shall not be installed within the secondary containment areas.
- 3) Vehicle service facilities shall not contain floor drains unless the floor drains are connected to wastewater pretreatment systems prior to discharge to the sanitary sewer, for which an industrial waste discharge permit has been obtained. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.
- 4) Tanks, containers or sinks used for parts cleaning or rinsing shall not be connected to the storm drain system. Tanks, containers or sinks used for such purposes may only be connected to the sanitary sewer system if allowed by an industrial waste discharge permit. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.

L. Fuel Dispensing Areas

- 1) Fueling areas² shall have impermeable floors (i.e., portland cement concrete or equivalent smooth impervious surface) that are: a) graded at the minimum slope necessary to prevent ponding; and b) separated from the rest of the site by a grade break that prevents run-on of stormwater to the maximum extent practicable.
- 2) Fueling areas shall be covered by a canopy that extends a minimum of ten feet in each direction from each pump. [Alternative: The fueling area must be covered and the cover's minimum dimensions must be equal to or greater than the area within the grade break or fuel dispensing area, as defined below¹.] The canopy [or cover] shall not drain onto the fueling area.

M. Loading Docks

- 1) Loading docks shall be covered and/or graded to minimize run-on to and runoff from the loading area. Roof downspouts shall be positioned to direct stormwater away from the loading area. Water from loading dock areas shall be drained to the sanitary sewer, or diverted and collected for ultimate discharge to the sanitary sewer. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.
- 2) Loading dock areas draining directly to the sanitary sewer shall be equipped with a spill control valve or equivalent device, which shall be kept closed during periods of operation.
- 3) Door skirts between the trailers and the building shall be installed to prevent exposure of loading activities to rain.

N. Fire Sprinkler Test Water

1) Sanitary sewer connections shall be provided to drain fire sprinkler test water.

O. Miscellaneous Drain or Wash Water

- 1) Boiler drain lines shall be directly or indirectly connected to the sanitary sewer system and may not discharge to the storm drain system.
- [Air compressor or air conditioner] condensate drain lines may not discharge to the storm drain system.
- 3) Roof drains shall discharge and drain away from the building foundation to an unpaved area wherever possible.
- 4) Roof top equipment shall drain to the sanitary sewer. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.

² The fueling area shall be defined as the area extending a minimum of 6.5 feet from the corner of each fuel dispenser or the length at which the hose and nozzle assembly may be operated plus a minimum of one foot, whichever is greater.

OPERATIONAL BMPS

A. Paved Sidewalks and Parking Lots

2) Sidewalks and parking lots shall be swept regularly to prevent the accumulation of litter and debris. Debris resulting from pressure washing shall be trapped and collected to prevent entry into the storm drain system. Washwater containing any cleaning agent or degreaser shall be collected and discharged to the sanitary sewer and shall not be discharged to a storm drain. The applicant shall contact the local permitting authority and/or sanitary district with jurisdiction for specific connection and discharge requirements.

B. Private Streets

1) Owner of private streets and storm drains shall prepare and implement a plan for street sweeping of paved private roads and cleaning of all storm drain inlets.

C. Vehicle/Equipment Repair and Maintenance

- 5) No person shall dispose of, nor permit the disposal, directly or indirectly, of vehicle fluids, hazardous materials, or rinsewater from parts cleaning operations into storm drains.
- 6) No vehicle fluid removal shall be performed outside a building, nor on asphalt or ground surfaces, whether inside or outside a building, except in such a manner as to ensure that any spilled fluid will be in an area of secondary containment. Leaking vehicle fluids shall be contained or drained from the vehicle immediately.
- 7) No person shall leave unattended drip parts or other open containers containing vehicle fluid, unless such containers are in use or in an area of secondary containment.

D. Fueling Areas

1) The property owner shall dry sweep the fueling area routinely.